

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION**

|                     |   |                          |
|---------------------|---|--------------------------|
| Whitney Harrison,   | ) | C/A No. _____            |
|                     | ) |                          |
| Plaintiff,          | ) |                          |
|                     | ) |                          |
| vs.                 | ) |                          |
|                     | ) | <b>NOTICE OF REMOVAL</b> |
| Ford Motor Company, | ) |                          |
|                     | ) |                          |
| Defendant.          | ) |                          |
|                     | ) |                          |

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**TO: THE HONORABLE JUDGE OF THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA, ANDERSON DIVISION**

Pursuant to 28 U.S.C. §§ 1332, 1441, 1446, and Local Civil Rule 83.IV.01, DSC, Defendant Ford Motor Company (“Ford”) hereby files its Notice of Removal of this action from the South Carolina Court of Common Pleas for Anderson County to the United States District Court for the District of South Carolina, Anderson Division, based upon the following:

1. That Plaintiff Whitney Harrison commenced this action with the filing of her Summons and Complaint, Civil Action Number 2021-CP-40-02275, in the South Carolina Court of Common Pleas for Anderson County on November 24, 2021, and service of the Summons and Complaint upon Ford on or about December 2, 2021, and this case is now pending in the South Carolina Court of Common Pleas for Anderson County located within the above-named Division of this Court. The time within which Ford is required to answer or plead to the Complaint has not yet expired, and Ford has not answered or pleaded to the said Complaint.

2. That upon information and belief, at the time of the commencement of this action and of the filing of this Notice of Removal, Plaintiff was and is a citizen and resident of the State of South Carolina.

3. That Ford was and is a corporation organized and existing pursuant to the laws of the State of Delaware, with its principal place of business in the State of Michigan.

4. That at all pertinent times, Plaintiff and Ford were citizens of different States of the United States.

5. That this action is a civil case in which Plaintiff alleges she suffered serious and debilitating injuries as a result of a vehicular accident that occurred in Anderson County, South Carolina, on February 22, 2021. Plaintiff asserts causes of action against Ford for negligence and strict liability, and prays for actual and punitive damages.

6. That Plaintiff's Complaint does not specify a specific prayer for actual damages or punitive damages, but a reasonable interpretation of the Complaint is that the matter in controversy between the Plaintiff and Ford, exclusive of interest and costs, exceeds the sum or value of Seventy-Five Thousand and No/100 (\$75,000.00) Dollars, of which the United States District Courts have original jurisdiction pursuant to 28 U.S.C. § 1332.

7. That Ford filed herewith in this Court a copy of all process, pleadings and orders served upon it in this action, as a part of this Notice of Removal; being the Summons, Complaint. Affidavit of Service, and Service of Process Transmittal.

8. That the Clerk of Court from which the action is removed has been served with a copy of the Notice of Removal.

WHEREFORE, Ford prays that this Notice of Removal be accepted as sufficient for removal of the said action to this Court.

TURNER, PADGET, GRAHAM & LANEY, P.A.

December 30, 2021

By: s/ Carmelo B. Sammataro  
J. Kenneth Carter, Jr. (Fed. I.D. No. 9174)  
Megan A. Rushton (Fed. I.D. No. 13303)  
Post Office Box 1509  
Greenville, SC 29602  
Phone: (864) 552-4600  
Fax: (864) 552-4620  
KCarter@TurnerPadget.com  
MRushton@TurnerPadget.com

Carmelo B. Sammataro (Fed. I.D. No. 9174)  
Post Office Box 1473  
Columbia, SC 29202  
Phone: (803) 254-2200  
Fax: (803) 799-3957  
SSammataro@TurnerPadget.com

ATTORNEYS FOR DEFENDANT